

HON. JUDGE DAVID G. ESTUDILLO

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT TACOMA**

International Partners For Ethical Care,
Inc., Advocates Protecting Children,
Parents 1A, 1B, 2A, 2B, 3A, 3B, 4A, 4B,
5A, and 5B,

Plaintiffs,

v.

Jay Inslee, Governor of Washington, in his
official capacity; Robert Ferguson,
Attorney General of Washington, in his
official capacity; and Ross Hunter,
Secretary of the Washington Department of
Children, Youth, and Families, in his
official capacity,

Defendants.

No. 3:23-cv-05736-DGE

DECLARATION OF ERIN L.
LOVELL IN SUPPORT OF MOTION
OF LEGAL COUNSEL FOR YOUTH
AND CHILDREN TO APPEAR AS
AMICUS

ERIN L. LOVELL makes the following declaration based on personal knowledge:

1. I am over 18 years of age. I am competent to testify. The facts contained in this Declaration are based on my personal knowledge, unless stated otherwise.

2. I am the Executive Director of Legal Counsel for Youth and Children ("LCYC"), a nonprofit corporation operating under the laws of Washington State.

1 3. I have served families and children in Washington as a legal advocate since
2 2005.

3 4. I served as a licensed foster parent, through Lutheran Community Services, from
4 January 2019 through August 2021.

5 5. Before helping to found LCYC, I represented parents and youth in child welfare
6 matters as a staff attorney with The Defender Association, now a division of the King County
7 Department of Public Defense.
8

9 **I. LCYC’S MISSION AND VALUES**

10 6. LCYC’s mission is to protect the interests and safety of youth in Washington by
11 advancing their legal rights.

12 7. LCYC accomplishes this mission through direct legal representation, strong
13 community partnerships, and systemic advocacy.

14 8. LCYC’s guiding principles include the axiom that young people have unique
15 legal rights.

16 9. This includes the recognition that young people have equal status and dignity as
17 members of the human family and specific rights that recognize their unique needs.

18 10. Most pertinent to the pending dispute: LCYC operates on the bedrock premise
19 that young people are neither the possessions of parents nor of the state.
20

21 **II. LCYC’S FUNCTION**

22 11. LCYC provides legal services through four main program areas: child welfare,
23 youth defense, youth and family immigration, and youth homelessness. LCYC attorneys
24
25

1 represent youth in child welfare and other juvenile court matters. LCYC attorneys also advocate
2 for youth in minor guardianships and on a variety of other civil legal issues.

3 12. LCYC's representation of youth goes beyond traditional public defense.

4 13. For example, LCYC assists youth with housing, education, immigration, and
5 public benefits.

6 14. LCYC's attorneys are trained on how to build relationships of trust with youth in
7 crisis and provide legal counsel in a developmentally appropriate manner.

8 15. LCYC is distinct from other legal organizations serving children for reasons
9 including its responsiveness to youth in crisis.
10

11 **III. LCYC'S YOUTH HOMELESS MISSION**

12 16. One critical way in which LCYC effects its mission is its Youth Homeless
13 Programs.

14 17. Young people aged 12-24 who are experiencing or at risk of housing instability
15 can be eligible for LCYC's free civil legal services.

16 18. Young people served through this program include not just those experiencing
17 homelessness but those who are on the median: couch surfing, struggling to access emergency
18 shelter, temporarily living with friends or family, facing eviction, or feeling unsafe or
19 unwelcome at home.
20

21 19. Examples of services LCYC helps these youth address include: emancipation,
22 child protective services, civil protection orders, gender marker and name changes, eviction,
23 landlord tenant issues, minor guardianship, and debt relief.

24 20. LCYC also provides onsite legal services at shelters and drop-in centers to
25 increase youth engagement.

1 21. In 2017, the Homeless Youth Legal Network of the American Bar Association
2 recognized LCYC as one of twelve model programs nationally, providing quality direct services
3 to address youth homelessness.

4 22. In 2018, an independent consultant's evaluation¹ found LCYC's services for
5 homeless youth have an "immediate, positive impact" on those youth.

6 23. One of the most powerful statements LCYC has received from its youth clients
7 is: "I didn't know I had all those rights."

8 24. Attached hereto as Exhibit A is a true and correct copy of guidance from the
9 Washington State Department of Children, Youth & Families dated July 20, 2023, regarding
10 implementation of SHB 1406 and ESSB 5599. I have personal knowledge of the dissemination
11 of these materials, as these were provided to LCYC by the Department in the normal course of
12 business.

13 25. Attached hereto as Exhibit B is a true and correct copy of LCYC's proposed brief
14 in support of the State's pending motion to dismiss this lawsuit.
15

16 **I declare under penalty of perjury of the laws of the State of Washington and the laws of**
17 **the United States of America that the foregoing is true and correct.**

18 Dated January 17, 2024, at Seattle, Washington.

19
20 Erin L Lovell

Erin L Lovell (Jan 17, 2024 17:36 PST)

21 ERIN L. LOVELL
22
23 _____

24 ¹ Available at

25 https://static1.squarespace.com/static/533dcf7ce4b0f92a7a64292e/t/5b1ea8ec8a922d326ad45097/1528735982236/LCYC+LSPY+Final+Evaluation+Report_May+2018.pdf.